

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN and AUGUST  
TERRENCE ROLIN, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

V.

CASE NO. 2:20-cv-00064-LPL

TRANSPORTATION SECURITY  
ADMINISTRATION; DAVID P. PEKOSKE,  
Administrator, Transportation Security  
Administration, in his official capacity; DRUG  
ENFORCEMENT ADMINISTRATION; UTTAM  
DHILLON, Acting Administrator, Drug  
Enforcement Administration, in his official  
Capacity; "STEVE" LAST NAME UNKNOWN,  
Agent, Drug Enforcement Administration, in his  
individual capacity; and UNITED STATES OF  
AMERICA,

Defendants.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Transportation Security Agency (“TSA”), TSA Administrator David P. Pekoske, the Drug Enforcement Administration (“DEA”), DEA Acting Administrator Uttam Dhillon, and the United States of America (together, the “Government Defendants”) respectfully move for an extension of time to May 29, 2020, for the Government Defendants to file either an answer to the complaint or a motion pursuant to Fed. R. Civ. P. 12.

1. The Government Defendants were served with the complaint on or about January 24, 2020. Accordingly, the Government Defendants' answer or other response to the complaint was originally due on March 24, 2020.

2. By stipulation of the parties, the Government Defendants' answer deadline was initially extended by 45 days, to May 8, 2020. *See* ECF No. 22. Due to a variety of circumstances, including disruptions to agency operations caused by the COVID-19 pandemic, and an unexpected press of business faced by the undersigned counsel in other cases, the Government Defendants respectfully request that their deadline to answer or otherwise respond to the complaint be extended by 21 days, from May 8, 2020, to May 29, 2020.

3. This is the Government Defendants' first motion for an extension of time to respond to the complaint. As noted above, the parties previously stipulated to a 45-day extension of the Government Defendants' original answer deadline. Counsel for the Government Defendants has conferred with counsel for Plaintiffs, who do not oppose this motion.

Accordingly, the Government Defendants respectfully request that their deadline to file an answer or motion to dismiss pursuant to Fed. R. Civ. P. 12 be extended to May 29, 2020. In accordance with this Court's Local Rules, this motion is accompanied by a proposed order.

Dated: April 28, 2020

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General

SCOTT W. BRADY  
United States Attorney

BRIGHAM J. BOWEN  
Assistant Director

/s/ Elizabeth Tulis

ELIZABETH TULIS

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
1100 L Street, NW  
Washington, DC 20005  
Tel: (202) 514-9237  
Fax: (202) 616-8470  
E-mail: elizabeth.tulis@usdoj.gov

*Attorneys for the Government Defendants*